

38	08/23/00	ROMEO MCCARTHY SULLIVAN INNARELLI	fraudulently caused Option One Mortgage to wire approximately \$67,500.00 into INNARELLI's IOLTA account for the sale of 59-61 Avon Place, Springfield, MA
39	09/11/00	BERGDOLL JARRETT INNARELLI	fraudulently caused Equicredit to wire approximately \$72,000.00 into Innarelli's IOLTA account for the sale of 100-104 Greene Street, Springfield, MA
40	09/15/00	MATOS ZEPKA SULLIVAN INNARELLI	fraudulently caused National City Mortgage to wire approximately \$58,800.00 into INNARELLI's IOLTA account for the sale of 20 Alden Street, Springfield, MA
41	10/05/00	MATOS ZEPKA SULLIVAN INNARELLI	fraudulently caused Meritage Mortgage Corporation to wire approximately \$59,500.00 into INNARELLI's IOLTA account for the sale of 75-77 Clifton Avenue, Springfield, MA
42	10/20/00	ROMEO MCCARTHY SULLIVAN INNARELLI	fraudulently caused Option One Mortgage Corporation to wire approximately \$71,200.00 into INNARELLI's IOLTA account for the sale of 49 Montrose Street, Springfield, MA
43	10/30/00	BERGDOLL JARRETT INNARELLI	fraudulently caused Equicredit to wire approximately \$72,000.00 into INNARELLI's IOLTA account for the sale of 62-64 Alderman Street, Springfield, MA
44	11/07/00	ROMEO MCCARTHY INNARELLI	fraudulently caused Option One Mortgage to wire approximately \$76,500.00 into INNARELLI's IOLTA account for the sale of 84 Andrew Street, Springfield, MA

45	11/22/00	BERGDOLL ROMEO MCCARTHY SULLIVAN INNARELLI	fraudulently caused Option One Mortgage to wire approximately \$77,900.00 into INNARELLI's IOLTA account for the sale of 62 Sycamore Street, Springfield, MA
46	12/28/00	MATOS MCCARTHY ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$68,964.00 into INNARELLI's IOLTA account for the sale of 45 Montmorenci Street, Springfield, MA
47	01/08/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$98,455.00 into INNARELLI's IOLTA account for the sale of 13-15 Maple Street, Westfield, MA
48	01/18/01	ROMEO CORONA JARRETT INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$104,500.00 into INNARELLI's IOLTA account for the sale of 37-39 Commonwealth Street, Springfield, MA
49	02/09/01	BERGDOLL ROMEO JARRETT MCCARTHY SULLIVAN INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$92,700.00 into INNARELLI's IOLTA account for the sale of 50 Church Street, Westfield, MA
50	02/07/01	BERGDOLL ROMEO LYNCH INNARELLI	fraudulently caused American Residential Mortgage to wire approximately \$64,000.00 into INNARELLI's IOLTA account for the sale of 617-619 Union Street, Springfield, MA

51	02/16/01	BERGDOLL SULLIVAN INNARELLI	fraudulently caused Alliance Funding to wire approximately \$64,000.00 into INNARELLI's IOLTA account for the sale of 154 Oak Grove, Springfield, MA
52	03/12/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$97,470.00 into INNARELLI's IOLTA account for the sale of 2-4 St. Jerome Avenue, Holyoke, MA
53	04/13/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$95,501.00 into INNARELLI's IOLTA account for the sale of 126-128 White Street, Springfield, MA
54	04/23/01	MATOS ZEPKA SULLIVAN INNARELLI	fraudulently caused Delta Funding Corporation to wire approximately \$64,500.00 into INNARELLI's IOLTA account for the sale of 93 Dawes Street, Springfield, MA
55	04/30/01	MCCARTHY SULLIVAN INNARELLI	fraudulently caused Mortgage Approval Services to wire approximately \$68,000.00 into INNARELLI's IOLTA account for the sale of 25-27 Colchester Street, Springfield, MA
56	06/08/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$82,702.00 into INNARELLI's IOLTA account for the sale of 49 Palmer Avenue, Springfield, MA
57	06/12/01	BERGDOLL MATOS SULLIVAN INNARELLI	fraudulently caused Alliance Funding to wire approximately \$67,200.00 into INNARELLI's IOLTA account for the sale of 22 Burr Street, Springfield, MA

58	07/11/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$107,315.00 into INNARELLI's IOLTA account for the sale of 464-466 Pleasant Street, Holyoke, MA
59	08/08/01	ROMEO MCCARTHY CORONA INNARELLI	fraudulently caused Alliance Funding to wire approximately \$72,250.00 into INNARELLI's IOLTA account for the sale of 12-14 James Street, Springfield, MA
60	08/09/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$84,671.00 into INNARELLI's IOLTA account for the sale of 66 Crystal Avenue, Springfield, MA
61	09/19/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$87,624.00 into INNARELLI's IOLTA account for the sale of 82 Miller Street, Springfield, MA
62	10/02/01	MATOS SULLIVAN INNARELLI	fraudulently caused Delta Funding Corporation to wire approximately \$70,400.00 into INNARELLI's IOLTA account for the sale of 272-274 Orange Street, Springfield, MA
63	10/12/01	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$87,624.00 into INNARELLI's IOLTA account for the sale of 15 Forest Street, Springfield, MA
64	10/19/01	MATOS ZEPKA INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$114,207.00 into INNARELLI's IOLTA account for the sale of 20-22 Gates Street, Holyoke, MA

65	12/12/01	MATOS ZEPKA SULLIVAN INNARELLI	fraudulently caused Countrywide Home Loans to wire approximately \$113,223.00 into INNARELLI's IOLTA account for the sale of 130-132 Orange Street, Springfield, MA
66	03/06/02	MATOS ROMEO ZEPKA FREDERICK INNARELLI	fraudulently caused McCue Mortgage Company to wire approximately \$90,550.00 into INNARELLI's IOLTA account for the sale of 51 Kensington Avenue, Springfield, MA
67	04/02/02	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused McCue Mortgage to wire approximately \$97,450.00 into INNARELLI's IOLTA account for the sale of 140 West Alvord Street, Springfield, MA
68	05/06/02	MATOS ZEPKA FREDERICK INNARELLI	fraudulently caused McCue Mortgage Company to wire approximately \$135,850.00 into INNARELLI's IOLTA account for the sale of 58-60 Howes Street, Springfield, MA

All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT SIXTY-NINE:** Title 18, United States Code, Sections 1956(h) and 1957 - Conspiracy to Launder Money

24. The United States re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 23.

25. From at least 1995, the exact beginning date being unknown to the Grand Jury, and continuing thereafter through at least May, 2002, in the District of Massachusetts and elsewhere,

**ALBERT INNARELLI,  
MICHAEL BERGDOLL,  
ANTHONY MATOS,  
PASQUALE ROMEO,  
WILFRED CHANGASIE,  
THEODORE JARRETT,  
MARK MCCARTHY,  
JAMES SMITH,  
LAWRENCE LYNCH,  
EDGAR CORONA,  
KATHRYN ZEPKA,  
JONATHAN FREDERICK, and  
JOSEPH SULLIVAN,**

defendants herein, did unlawfully and knowingly combine, conspire, confederate, and agree with each other and other persons both known and unknown to the Grand Jury to commit an offense against the United States, that is, to knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, the withdrawal of funds, such property having been derived from a specified unlawful activity, which was wire fraud, a violation of Title 18, United States Code, Section

1343, by check from the IOLTA account of defendant Innarelli and other attorneys.

**The Objects of the Conspiracy**

The objects of the conspiracy included, but were not limited to, the following:

26. to facilitate the wire fraud scheme by paying the costs of the various third parties, such as any outstanding mortgages, involved in the real estate transactions and distributing the net profits of the wire fraud scheme to the defendants and co-conspirators for outstanding obligations and investment in future real estate transactions.

**Overt Acts in Furtherance of the Conspiracy**

27. As a part of and in furtherance of the above-described conspiracy and to accomplish the objects and purposes thereof, defendants herein and their co-conspirators did commit and cause to be committed overt acts, including, but not limited to, the following:

<u>Act</u>	<u>Date</u>	<u>Defendant</u>	<u>Overt Act in Furtherance</u>
1	11/20/98	BERGDOLL ROMEO JARRETT INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$42,000.00 into INNARELLI's IOLTA account for the sale of 86 Calhoun Street, Springfield, MA

2	01/19/99	JARRETT INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$63,000.00 into INNARELLI's IOLTA account for the sale of 271 Oak Grove Avenue, Springfield, MA
3	03/26/99	BERGDOLL JARRETT FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$55,200.00 into INNARELLI's IOLTA account for the sale of 70 Cuff Avenue, Springfield, MA
4	03/29/99	JARRETT FREDERICK	fraudulently caused Equicredit Corporation to wire approximately \$72,000.00 for the sale of 39 Eldridge Avenue, Springfield, MA
5	04/08/99	JARRETT MCCARTHY FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$63,750.00 into INNARELLI's IOLTA account for the sale of 886-886 ½ Dwight Street, Holyoke, MA
6	04/16/99	BERGDOLL ROMEO JARRETT MCCARTHY INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$48,000.00 into INNARELLI's IOLTA account for the sale of 100 Pearl Street, Springfield, MA
7	04/30/99	BERGDOLL CHANGASIE JARRETT MCCARTHY FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$52,000.00 into INNARELLI's IOLTA account for the sale of 83 Dawes Street, Springfield, MA
8	05/10/99	BERGDOLL JARRETT FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$62,050.00 into INNARELLI's IOLTA account for the sale of 84 Buckingham Avenue, Springfield, MA



9	05/18/99	BERGDOLL CHANGASIE JARRETT MCCARTHY FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$46,900.00 into INNARELLI's IOLTA account for the sale of 30-32 Lebanon Street, Springfield, MA
10	05/25/99	BERGDOLL ROMEO JARRETT MCCARTHY INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$56,950.00 into INNARELLI's IOLTA account for the sale of 142 Cedar Street, Springfield, MA
11	05/28/99	ROMEO MCCARTHY INNARELLI	fraudulently caused Option One Mortgage to wire approximately \$80,000.00 into INNARELLI's IOLTA account for the sale of 102-104 Cedar Street, Springfield, MA
12	06/08/99	BERGDOLL ROMEO JARRETT MCCARTHY FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$64,000.00 into INNARELLI's IOLTA account for the sale of 103 Central Street, Springfield, MA
13	06/08/99	BERGDOLL CHANGASIE JARRETT MCCARTHY FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$63,750.00 into INNARELLI's IOLTA account for the sale of 139 Berkshire Avenue, Springfield, MA
14	06/14/99	BERGDOLL ROMEO JARRETT FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$48,000.00 into INNARELLI's IOLTA account for the sale of 51 Armory Street, Springfield, MA
15	07/19/99	BERGDOLL ROMEO JARRETT MCCARTHY CORONA FREDERICK INNARELLI	fraudulently caused Equicredit to wire approximately \$59,620.00 into INNARELLI's IOLTA account for the sale of 81 Barber Street, Springfield, MA

16	08/19/99	BERGDOLL MATOS JARRETT SMITH FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$73,970.00 into INNARELLI's IOLTA account for the sale of 38-40 Clarendon Street, Springfield, MA
17	08/27/99	ROMEO JARRETT LYNCH INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$69,716.00 into INNARELLI's IOLTA account for the sale of 327-329 Bay Street, Springfield, MA
18	08/29/99	BERGDOLL ROMEO JARRETT FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$73,135.00 into INNARELLI's IOLTA account for the sale of 50-52 Stebbins Street, Springfield, MA
19	10/01/99	JARRETT MCCARTHY CORONA INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$67,300.00 into INNARELLI's IOLTA account for the sale of 6-8 Hampden Street, Springfield, MA
20	10/07/99	JARRETT MCCARTHY CORONA INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$79,200.00 into INNARELLI's IOLTA account for the sale of 825 Chicopee Street, Chicopee, MA
21	11/29/99	JARRETT MCCARTHY CORONA FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$72,000.00 into INNARELLI's IOLTA account for the sale of 15-17 Eaton Street, Springfield, MA
22	12/15/99	ROMEO JARRETT LYNCH	fraudulently caused Equicredit Corporation to wire approximately \$66,000.00 for the sale of 125-127 Alderman Street, Springfield, MA

23	12/17/99	ROMEO JARRETT MCCARTHY INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$66,400.00 into INNARELLI's IOLTA account for the sale of 52 Clarendon Street, Springfield, MA
24	12/27/99	JARRETT MCCARTHY CORONA FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$64,800.00 into INNARELLI's IOLTA account for the sale of 70-72 Maynard Street, Springfield, MA
25	12/31/99	BERGDOLL JARRETT INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$59,620.00 into INNARELLI's IOLTA account for the sale of 81 Arey Street, Springfield, MA
26	12/31/99	ROMEO LYNCH	fraudulently caused IndyMac Mortgage to wire approximately \$49,700.00 for the sale of 838-840 Worthington Street, Springfield, MA
27	02/07/00	ROMEO JARRETT LYNCH FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$58,400.00 into INNARELLI's IOLTA account for the sale of 62 Kenyon Street, Springfield, MA
28	03/08/00	CORONA SULLIVAN INNARELLI	fraudulently caused Diverse American Mortgage Company to wire approximately \$62,400.00 into INNARELLI's IOLTA account for the sale of 104 Eastern Avenue, Springfield, MA
29	03/14/00	MCCARTHY CORONA JARRETT FREDERICK INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$85,500.00 into INNARELLI's IOLTA account for the sale of 740 Allen Street, Springfield, MA

30	04/03/00	ROMEO LYNCH	fraudulently caused IndyMac Mortgage to wire approximately \$77,000.00 for the sale of 14-16 Aspen Street, Ware, MA
31	04/13/00	CORONA JARRETT MCCARTHY INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$83,610.00 into INNARELLI's IOLTA account for the sale of 1349-1351 Worcester Street, Springfield, MA
32	06/17/00	MCCARTHY CORONA JARRETT SULLIVAN INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$79,200.00 into INNARELLI's IOLTA account for the sale of 31 Mazarin Street, Springfield, MA
33	08/03/00	MCCARTHY CORONA JARRETT SULLIVAN INNARELLI	fraudulently caused Equicredit Corporation to wire approximately \$77,670.00 into INNARELLI's IOLTA account for the sale of 71 Bernard Street, Springfield, MA
34	08/23/00	LYNCH	fraudulently caused Option One Mortgage to wire approximately \$67,500.00 into INNARELLI's IOLTA account for the sale of 59-61 Avon Place, Springfield, MA

28. The United States re-alleges and incorporates by reference Counts One through Sixty-Eight as additional overt acts as a part of and in furtherance of the above-described conspiracy.

All in violation of Title 18, United States Code, Section 1956(h), and Title 18, United States Code, Section 1957.

**18 U.S.C. § 982 - Criminal Forfeiture**

1. Counts One through Sixty-Nine of the Indictment are hereby realleged and incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

As a result of the offenses alleged in Counts One through Sixty-Nine,

**ALBERT INNARELLI,  
MICHAEL BERGDOLL,  
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MARK MCCARTHY,  
JAMES SMITH,  
LAWRENCE LYNCH,  
EDGAR CORONA,  
KATHRYN ZEPKA,  
JONATHAN FREDERICK, and  
JOSEPH SULLIVAN,**

defendants herein, shall forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

2. If any of the forfeitable property described in paragraph 1 above, as a result of any act or omission of the defendant --

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

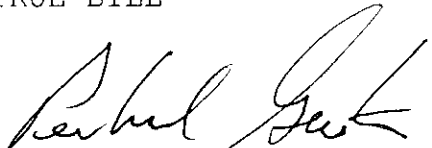
(d) has been substantially diminished in value; or

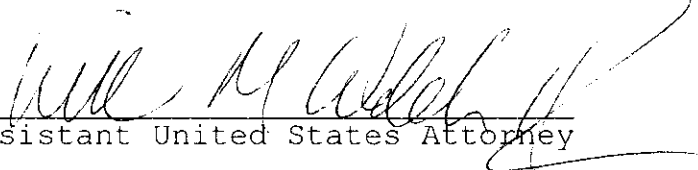
(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in subparagraphs (a) through (e) of this paragraph.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS: September 9, 2005 at 425

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK OF THE COURT